

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

DAMIEN DREIS,

Plaintiff,

v.

DEARBORN NATIONAL LIFE
INSURANCE COMPANY, a foreign
corporation,

Defendant.

NO. 2:14-CV-00620-MJP

PLAINTIFF'S PROPOSED NEUTRAL
STATEMENT

Trial Date: September 8, 2015

Plaintiff Damien Dreis worked for Defendant Dearborn National Life Insurance Company for three years. In late 2012/early 2013, Dearborn National laid off approximately 200 employees in a companywide Reduction in Force. Mr. Dreis was one of the affected employees.

Mr. Dreis claims that Dearborn National negligently or intentionally misled him concerning the amount of the severance that was provided to affected employees so that Mr. Dreis would resign before receiving the severance. Dearborn National denies that it did so, and claims that Mr. Dreis is at fault.

//

//

//

//

1 DATED this 19th day of August, 2015.

2 **PETERSON | WAMPOLD**
3 **ROSATO | LUNA | KNOPP**

4
5 /s/Mallory C. Allen

6 /s/Michael S. Wampold

7 Mallory C. Allen, WSBA No. 45468

8 Michael S. Wampold, WSBA No. 26053

9 Attorneys for Plaintiff

10 1501 4th Avenue, Suite 2800

11 Seattle, WA 98101

12 Ph. (206) 624-6800

13 allen@pwrlk.com

14 wampold@pwrlk.com

1 CERTIFICATE OF SERVICE

2 I hereby certify that on the date shown below I electronically filed the foregoing
3 document with the Clerk of the Court using the CM/ECF system which will send notification of
4 such filing to all counsel of record.

5 **Dated:** August 19, 2015

6 **PETERSON | WAMPOLD**
7 **ROSATO | LUNA | KNOPP**

8
9 /s/ Elizabeth Chandler
10 Elizabeth Chandler, Paralegal
11 1501 4th Avenue, Suite 2800
12 Seattle, WA 98101
13 Ph. 206-624-6800
14 Email: elizabeth@pwrlk.com
15
16
17
18
19
20
21
22
23
24
25
26